

PERFORMANCE ASSURANCE PLAN

VERIZON VERMONT

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PERFORMANCE ASSURANCE PLAN

I. INTRODUCTION

The Vermont Performance Assurance Plan (“Vermont PAP”) is a self-executing remedy plan that will ensure that Verizon Vermont (“Verizon VT”) continues to provide quality wholesale services to competitive carriers after Verizon VT has gained entry into the long distance market pursuant to Section 271 of the Telecommunications Act of 1996. The Vermont PAP is based on the New York PAP and Carrier-to-Carrier Guidelines (“C2C”). The Change Control Assurance Plan (“CCAP”) contained in Appendix I is also consistent with the New York Plan.

A. The Vermont PAP

The Vermont PAP has three major components: (1) the metrics used to report performance; (2) the methodology used to determine billing credits, including service segmentation, scoring method, and other rules described in the plan document; and (3) the dollars at risk. Each of these components is summarized below and is discussed in more detail in the following sections and Appendices.

1. Measures and Standards

The Vermont PAP utilizes the standards and measures set forth in the New York Carrier-to-Carrier Guidelines. The C2C measures include hundreds of individual data points that track and report on performance. Some metrics are compared with analogous Verizon retail services to ensure parity of service and others, where no retail analog exists, are reviewed on the basis of absolute standards. As in New York, where a subset of the C2C measures were selected for inclusion in the PAP, the Vermont PAP incorporates the same C2C measures and standards.

2. Methodology

(a) Service Segmentation

The Vermont PAP includes three service segmentations: Mode of Entry (“MOE”), Critical Measures, and Special Provisions.

The MOE segment measures the overall level of service on an industry-wide basis for each method or mode by which carriers can enter the local exchange market under the Telecommunications Act of 1996, *i.e.* resale, unbundled network elements, interconnection trunks and DSL. Any bill credits¹ generated in any one of these modes are allocated to competitors purchasing those types of services. The MOE component of the Vermont PAP is fully described in Section II.C. and in Appendices A and E.

The Critical Measures component measures performance in 12 critical areas that have been identified as most important to the provision of quality service. The Critical Measures are a subset of the measures included in the MOE segment. Additional bill credits will be provided for performance on these measures that fail to meet the standards. This segment provides a mechanism to assure that carriers are receiving non-discriminatory service on an individual basis. The complete list of Critical Measures is enumerated in Appendix B and scoring/credit calculations are in Appendix F.

The Special Provisions segment focuses on a number of measures that are viewed as measuring key aspects of Verizon VT’s performance. This segment establishes targets that Verizon VT must achieve for flow-through, order processing, hot-cuts, Local Service Request confirmations, ~~and~~ reject notices and billing claims. Verizon VT will provide bill credits to

¹ Checks will be issued to CLECs instead of “bill credits” here and throughout this plan pursuant to the condition set forth in the Board’s letter dated January 16, 2002, until Verizon has updated its New England billing system such that PAP credits are uniquely identified on wholesale bills.

those carriers who received service below target levels. The Special Provisions measures are described in Section II.E. and Appendix H.

(b) Change Control Assurance

Verizon is also subject to a separate Change Control Assurance Plan (“CCAP”). Change Control is designed to measure Verizon’s performance in implementing revisions to OSS interfaces and business rules that affect CLECs. The Change Control process is common to carriers operating in Vermont and New York. Under the Change Control Assurance Plan, \$470,000 in bill credits will be available to all CLECs in Vermont for unsatisfactory performance on four Change Control metrics. Change Control credits are described in Section II. B.2.

(c) Statistical Test

The Vermont PAP uses statistical methodologies as one means to determine if “parity” exists between Verizon VT’s wholesale and retail performance. For measures where parity is the standard and a sufficient sample size exists, a “modified z statistic” is used. The statistical methodology is described in Appendix D.

(d) Scoring

Each of the measures within the MOE segment is graded with a 0, -1, or -2 based on the statistical analysis and the magnitude of the z-statistic for the month. The performance score for each metric is then weighted. These weights were developed to reflect the importance of that metric in determining that markets are open to competition. Critical Measures performance is scored against sliding scales based on the statistical score and the magnitude of the difference between wholesale service and the applicable standards. Special Provisions are scored against absolute standards of performance. Each of the scoring, weighting, and credit distribution processes is contained in Appendices A, B, C, E, and F.

(e) *Self-executing aspects*

Verizon VT will report its performance on the Vermont PAP on a monthly basis. Within 30 days of the close of the second month after the month in which performance is being reviewed, PAP credits will be processed for each CLEC. To the extent that a CLEC is entitled to performance assurance payments or credits under an interconnection agreement between the CLEC and Verizon, the amount of any such interconnection agreement payment or credit will be credited against and reduce any amount due to the CLEC under the VT Plan.² The plan will become effective the first full calendar month following Verizon VT's entry into the long distance market in Vermont.

3. Dollars at Risk

The structure of the Vermont PAP includes three credit categories: Mode of Entry, Critical Measures, and Special Provisions. Each category has a Vermont-specific credit schedule and cap that are presented in greater detail in the Appendices. The Vermont PAP contains a maximum dollar amount at risk. The total cap for Verizon VT is \$1~~4.98253-83~~ million annually, which is made up of a Vermont PAP cap of \$1~~4.51253-36~~ million and a CCAP cap of \$0.47 million. The distribution of dollars is as follows:

	Dollars at Risk (millions)
Mode of Entry	\$3,146,000.54
Doubling of MOE	\$3,146,000.54
Critical Measures	\$5,670,5003.83
Special Provisions	
Flow Through	\$ 0.470,000
Hot Cut Performance	\$1,130,000.13

² This provision is included as a protection against the imposition of excessive, double incentive amounts. However, Verizon believes that the Carrier-to-Carrier Guidelines and the financial incentives of the VT Plan are so comprehensive and substantial as to make it unnecessary to include performance provisions in interconnection agreements.

EDI	\$ 0.850,000
<u>Billing</u>	<u>\$ 100,000</u>
CCAP	\$ 0.470,000
Verizon Vermont Total	\$14,982,500 3.83

Conditions for doubling of the MOE dollars at risk are explained fully in Section II.C.2. In addition, there is an additional category for Special Provisions associated with ordering that provides for an additional \$1.13 million, to be paid from the MOE dollars at risk, if Verizon VT does not meet service standards and has not reached the cap level for MOE. If Verizon VT's performance results in payments that reach the overall monetary cap, the Commission, at its discretion, may open a proceeding to resolve the underlying service problem. The Commission retains the discretion to investigate extraordinary wholesale service performance issues and to take appropriate corrective action.

II. PROVISIONS OF THE PLAN

A. Measures, Methods of Analysis and Standards

1. Measures

The measures and standards in the Vermont PAP have been taken directly from the Guidelines for Carrier-to-Carrier (C2C) Performance Standards and Reports as filed with the Public Service Board in Docket 6255 on June 1, 2001, and cover the areas of Pre-order, Ordering, Provisioning, Maintenance and Repair, Billing, and Network Performance.

2. Methods of Analysis

Verizon VT will use two interrelated methods to monitor wholesale performance to CLECs on the performance measurements. The first method is designed to measure Verizon VT's overall Section 271 performance in four categories that correspond to the methods or modes CLECs use to enter the local exchange market: Resale; Unbundled Network Elements ("UNEs"); Interconnection (Trunks); and DSL. This is referred to as the Mode of Entry ("MOE") Measurements method. A total of \$3.~~146~~⁵⁴ million in annual bill credits, with potential for doubling per the provisions in Section II.C.2, will be available to CLECs if Verizon VT provides the maximum allowable unsatisfactory performance in all four MOE categories. (See Appendix A.) The MOE measurements provide a mechanism to measure the overall level of Verizon VT's service to the entire CLEC industry in the four areas.

The second method, referred to as the Critical Measures measurements, measures Verizon VT's performance in 12 critical areas, on both a CLEC-specific and a CLEC-aggregate basis. The Critical Measures, which are a subset of the measures included in the MOE segment are: (1) OSS Interface; (2) % On-Time Ordering Notification; (3) % Completed; (4a) % Missed Appointment - VZ - Total - EEL; (4b) % Missed Appointments; (5) % Missed Appointments -

VZ - No Dispatch - Platform; (6) Hot Cut Performance; (7) % On-Time Performance - UNE LNP; (8) Missed Repair Appointments, (9) Mean Time to Repair; (10) % Repeat Reports within 30 days, (11) Final Trunk Groups Blocked, and (12) Collocation. A total of ~~\$5.67053.83~~ million in annual bill credits will be available to CLECs if Verizon VT provides the maximum allowable out of parity performance on all 12 Critical Measures. (See Appendix B.) The Critical Measures cover Verizon VT's service in areas critical to the CLECs and provide a mechanism to assure that CLECs on an individual basis are receiving non-discriminatory service.

In addition, the Plan contains a "Special Provisions" segment that focuses on a number of measures that measure key aspects of Verizon VT's performance after it gains entry into the InterLATA long distance market. In order to assure that Verizon VT will provide satisfactory service in these key areas, *e.g.*, flow through, ~~and~~ hot cuts, and billing, ~~\$1.7060~~ million is made available in addition to the ~~\$8.81657.37~~ million available under the MOE and Critical Measures for bill credits for these measures. In addition, \$1.13 million will be available for certain UNE ordering measures, to be paid from the MOE dollars at risk, if Verizon VT does not meet service standards and has not reached the cap level for MOE. (See Section II.E. *infra*.)

3. Standards

Each measure will be evaluated according to one of two standards. For the measures where a Verizon Vermont retail analog exists, a "parity" standard will be applied.¹ For those measures where no retail analogs are available, an absolute standard has been specified as a surrogate to determine whether Verizon VT is providing non-discriminatory service to the CLECs. The metrics with absolute standards are displayed in Appendix C.

¹ The parity measures in the Plan fall into two categories: Measured variables and Counted variables. Measured variables are metrics of means or averages, such as mean time to repair. Counted variables are metrics of proportions such as percent measures.

B. Distribution Of The MOE and Critical Measures Credits

1. Distribution of Bill Credits

Annual bill credits totaling \$3.~~146~~⁵⁴ million are attributed to the MOE measures and are distributed to each of the MOE categories in amounts that reflect the importance of that MOE to the local exchange competition. Each month one-twelfth (1/12) of the annual amount will be available for bill credits. (See Appendix A.) An analogous principle has been applied to the \$~~5.67053~~⁸³ million associated with Critical Measures bill credits. (See Appendix B.)

2. Reallocation of Potential Bill Credits

The Commission will have the authority to reallocate the monthly distribution of bill credits between and among any provisions of the Plan and the Change Control Assurance Plan. The Commission will give the Company 15 days notice prior to the beginning of the month in which the reallocation will occur. Any reallocation will be done pursuant to Commission order.

C. MOE Scoring And Bill Credit Calculations

1. Scoring

The measures and standards for the MOE measurements have been placed into four categories: Resale, UNE, Interconnection (Trunks) and DSL. Since the 1996 Act requires that Verizon VT provide interconnection “that is at least equal in quality” to that provided to itself, and “nondiscriminatory access” to unbundled elements, each month Verizon VT will apply statistical tests, which are described in Appendix D, to Verizon VT and CLEC performance data to develop z scores, t scores or equivalent permutation scores for the measures.² These statistical scores will be converted into a performance score for each MOE measure as follows:

² The statistical methodologies set forth in Appendix D were taken from the New York State
(Continued . . .)

<u>Statistical Score</u>	<u>Performance Score</u>
$Z \leq -1.645$	-2
$-1.645 < Z \leq -0.8225$	-1
$-0.8225 < Z$	0

For small sample sizes of measures with a parity standard, the Permutation Test will be applied to obtain the statistical scores, which will be converted into a performance score. (See Appendix D.) For small sample sizes of measures with an absolute standard of 95%, a small sample size table will be applied to obtain the performance scores. Measures with absolute standards will be given a performance score of 0, -1, or -2 depending on the performance for that measure. (See Appendix C.)

Thus, for each of the measures within the four MOE categories, Verizon VT's performance will be graded 0, -1, or -2. Each measure with a performance score of -1 in a given month will be subject to change, depending upon the previous two z-statistics or t-statistics ~~score for that measure in the next two months.~~ Should If Verizon VT's previous two z-statistics or t-statistics were greater than or equal to -0.8225, ~~maintain a performance score of 0 for the next two months,~~ then the score in the current original month will be changed from -1 to 0. The 0 would then be used in conjunction with all of the other metrics in that MOE category to determine an aggregate score. A score of -2 in a given month will not be subject to change based upon previous performance ~~in subsequent months~~. The performance score for each metric will then be weighted, based upon the importance of the metric in determining whether that MOE is

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open to competition. (See Appendix A, which lists the weights for the MOE measurements.) The weighted scores will then be aggregated (averaged) by each MOE category (Resale, UNE, Interconnection and DSL), producing an overall weighted score for each of the four categories.

2. Bill Credit Calculations

If Verizon VT's overall (aggregate) performance score in the four categories falls below a minimum score in any given month, wholesale price reductions in the form of bill credits will be implemented and remain in effect for one month.³ If an overall score falls to the maximum score or below, the maximum wholesale price reduction will be implemented. Scores between the minimum and maximum scores will also be entitled to credits pursuant to a credit table for each MOE category. Credit Tables with the range of scores between the minimum and maximum and the applicable rates appear in Appendix A. All payments under the MOE segment of the PAP will be made to the Vermont Universal Service Fund established under 30 V.S.A. § 7501 et. seq., in such form and at such times as the Board determines. ~~The bill credits payable to the CLECs will be determined each month by dividing the amount from the table in Appendix A by the actual monthly volumes of the CLEC units in service. The measurement units for each of the MOEs is as follows:~~

- ~~1. UNE Lines in service at end of month;~~
- ~~2. Resale Lines in service at end of month;~~
- ~~3. Interconnection (Trunks) Minutes of use in month; and~~
- ~~4. DSL Lines in service at end of month.~~⁴

³ The intent is that the minimum score for each MOE category corresponds to the threshold at which there is a 95% certainty that parity does not exist.

⁴ For the purpose of the Plan:

1. Lines in service for UNE means UNE-Platform lines, all types of loops and IOF.
2. Lines in service for Resale means Resale lines plus circuits.
3. Trunks – minutes of use per month.

(Continued . . .)

The maximum scores represent the maximum allowable out of parity condition. The minimum and maximum performance scores and the start point percentages are as follows:

	<u>Minimum Market Adj</u>	<u>Maximum Market Adj</u>	<u>% Market Adj at Minimum⁵</u>
UNE	-.17 685429	-.67000	20%
Resale	-.1 70296922	-.67000	20%
Interconnection	-.31909	-1.00000	20%
DSL⁶	-.19705	-0.67000	20%

If an aggregate MOE score is less than one half the difference (*i.e.*, below the midpoint) between the minimum and maximum scores in any one of the four MOE categories for three consecutive months, the amounts in the credit tables in Appendix A for that same three-month period will be doubled for the applicable MOE category. (The midpoints for the MOEs are delineated in Appendix A.) The amounts in Appendix A will remain doubled until such time as Verizon VT achieves a score of one quarter (or greater) the difference between the minimum and maximum scores in that category in any given month. Appendix E provides a detailed step-by-step description of how the MOE performance scores and bill credits will be calculated and distributed to the CLECs.

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4. Lines in service for DSL means DSL UNE loops and line shared loops.

⁵ The “% Market Adj At Minimum” indicates the amount of monthly bill credits that will be due to CLECs if Verizon VT trips the minimum score. For example, if Verizon RI were to score -.173 on the UNE MOE in a month, 20% of the \$~~157,300~~~~177,000~~ monthly amount would be due. (See Appendix A.)

⁶ The minimum and maximum market adjustment scores above for DSL have been calculated assuming PR-3-03 to be an absolute measure. However, if the provisioning interval for line sharing to CLECs is better than the absolute standard, PR-3-03 would be scored as a parity measure, and the scores would range from -0.22082 to -0.67000.

3. The Domain Clustering Rule

Domain Clustering will provide CLECs with an additional layer of protection under the MOE mechanism. The term Domain refers to four service quality measures (*i.e.*, Pre-Order Ordering, Provisioning, and Maintenance and Repair)⁷ that are included in the UNE, Resale and DSL MOEs. Under the Domain Clustering Rule, each Domain will be reviewed each month. If 75% or more of the respective Ordering, Provisioning, or Maintenance and Repair Domain weights are tripped, the higher of the clustering overlay or overall market score will be used to determine the market adjustments for the UNE, Resale and DSL MOEs. The same rule will apply to the Pre-Ordering Domain, except that the clustering overlay would be effective if all Pre-Ordering response time measures failed at the -2 level, in which case 75% would be used in the overlay calculations. The Domain Clustering methodologies are set forth in detail in Appendix E.

D. Critical Measures Scoring And Bill Credit Calculations

1. Scoring

Verizon VT's performance in 12 measurement categories is critical to the CLECs' ability to compete in the Vermont local exchange market. Should Verizon VT performance miss the applicable performance standards for even *one* of these 12 categories, eligible CLECs will be entitled to bill credits. (*See* Appendix B.) The statistical tests and performance scoring mechanism described in the MOE section also apply to these measures.⁸

⁷ The domains do not include billing.

⁸ To the extent that a Critical Measure contains more than one measure, the weights from Appendix A will be used to determine the amount of bill credits available for the individual measure.

2. Bill Credit Calculations

For each Critical Measure, Verizon VT's performance for all CLECs during a given month will be averaged. Should the resulting performance score in any one category fall to -1 or below ("sub-standard performance"),⁹ 50% of the maximum bill credits for that measure will be payable to eligible CLECs. The eligible CLECs are all those CLECs that received sub-standard performance during that month (the "Aggregate Rule") In addition, should any CLEC receive sub-standard performance for two consecutive months, bill credits for that CLEC will be implemented for the two month period, notwithstanding the fact that all CLECs on average may have received satisfactory performance during the two months (the "Individual Rule").¹⁰

Bill credits will increase by ten incremental amounts for performance scores between -1 and -2, or Z or t scores between -0.8225 and -1.645. The amounts payable to each CLEC will be in direct proportion to the amount of service that CLEC receives from Verizon VT compared to the other CLECs who received sub-standard performance pursuant to the critical measure. For example, under Critical Measure No. 10, % Repeat Reports within 30 days, the percent of bill credits for an unsatisfactory score would be calculated by determining the number of lines a CLEC had compared to other CLECs that received sub-standard performance.¹¹ If a score falls

⁹ The Permutations Test will be used to derive Z and t scores for measures with small sample sizes as described in the Guidelines and Appendix D.

¹⁰ If all CLECs on average received an aggregate score below -1 for both months, the individual CLEC with the below average score would be entitled to bill credits for the Critical Measure in question under the Aggregate Rule. Likewise, if all CLECs on average received an aggregate score below -1 for the first of the two months and an aggregate score above -1 for the second month, the individual CLEC with sub-standard performance during both months would be entitled to receive bill credits pursuant to the Aggregate Rule for the first month and pursuant to the Individual Rule for the second month. A CLEC is only entitled to receive Bill Credits under the Individual Rule if it receives a score of -1 or less in a Critical Measure category and the CLEC group on average received a score greater than -1 for the Critical Measure.

¹¹ For Collocation – bill credits distribution will be determined by the cages completed during
(Continued . . .)

to the maximum level, the maximum bill credits will be implemented for the Critical Measure in question.

Appendix F provides a detailed step-by-step description of how the Critical Measures scores and bill credits will be calculated and distributed to the CLECs.

E. Special Provisions

A number of key measures have been identified that measure aspects of Verizon VT's performance on service quality items that are viewed as essential for CLECs during the first year after Verizon VT's entry in the InterLATA market. Accordingly, additional funds will be made available for these measures under the subparagraphs described below.

1. Flow Through Measures For UNEs

Verizon VT will make an additional \$470,000 available for potential bill credits, which will be paid on a quarterly basis, for the following flow through UNE metrics measured on a cumulative quarterly basis: OR-5-01 "% Flow Through - Total" and OR-5-03 "% Flow Through Achieved." A performance standard of 70% will apply to OR-5-01, and a performance standard of 90% will apply to OR-5-03. If at the end of any quarter Verizon VT has not achieved one of these two performance standards, it will distribute \$117,500 in bill credits. Any bill credits due under this section will be calculated based upon quarterly performance beginning with the first three calendar months after the effective date of this plan. The bill credits will be available to all

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month, *i.e.*, collocation arrangements completed: all arrangements including (a) physical, (b) virtual and (c) other collocation arrangements provided under tariff.

CLECs purchasing UNEs. Any amounts due will be credited based on the CLEC's lines in service.¹² The scoring methodology for this measure is set forth in more detail in Appendix H.

2. UNE Ordering Performance

An additional \$94,167 per month, or \$1.13 million annually, will be made available for bill credits for four non-flow through UNE performance measures:

- OR-1-04 % On Time LSRC < 10 lines (Electronic) – POTS
- OR-1-06 % On Time LSRC ≥ 10 lines (Electronic) – POTS
- OR-2-04 % On Time LSR Reject < 10 lines (Electronic) – POTS
- OR-2-06 % On Time LSR Reject ≥ 10 lines (Electronic) – POTS

Funding for these additional bill credits will come from any unused MOE funds in a month or the six prior months. \$23,542 in bill credits per metric will be distributed under this section to all CLECs ordering UNEs based on the CLEC's lines in service if performance is less than 90% on the respective measures. For small sample sizes of measures with an absolute standard of 90%, a small sample size table will be applied to obtain the performance scores (Appendix C). These credits will be distributed like the bill credits under Critical Measures, Aggregate Rule. (*See Appendix H.*)

3. Additional Hot Cut Performance Measures

An additional \$1.13 million for bill credits will be made available for service quality related to two Hot Cut Performance Measures: PR-9-01 "Missed Appointment - % on Time Performance - Hot Cut" and PR-6-02 "Installation Quality - % Installation Troubles Reported Within 7 Days." Bill credits will be paid under this section if either of two events occurs:

- (a) If for any two consecutive months, Verizon VT fails to achieve either 90% on-time performance for Hot Cuts or

¹² Lines in service will equal: UNE-P, UNE Loops, IOF, and EEL Loops.

scores greater than a 3.00% rate for installation troubles within 7 days for hot cuts, Verizon VT will distribute \$47,083 in bill credits to the affected CLECs. These credits will be distributed like the bill credits under Critical Measures, Aggregate Rule. If Verizon VT fails to meet either of these measures in the first month, but meets them in the second month, no bill credits will be due.

- (b) If for any one month, Verizon VT fails to achieve 85% on-time performance for Hot Cuts or scores greater than a 4.00% rate for installation troubles within 7 days for hot cuts, Verizon VT will distribute \$94,167 in bill credits to the affected CLECs for that month. These credits will be distributed like the bill credits under Critical Measures, Aggregate Rule. (See Appendix H.)

4. Electronic Data Interchange Measures

In order to ensure that the Electronic Data Interchange (“EDI”) between Verizon VT Operational Support Systems (“OSS”) and the CLEC systems is providing non-discriminatory service, \$850,000 in additional funds will be made available for the measures described below.

a. % Missing Notifier Trouble Ticket PONs Cleared Within 3 Business Days

This measure is defined as the percent of EDI missing notifier trouble ticket PONs cleared within 3 business days from the day of receipt of the trouble ticket. The elapsed time begins with receipt at the Verizon Systems Support Help Desk of a trouble ticket for the EDI missing notifiers (*i.e.*, order acknowledgement, order confirmation, order rejection, work completion, and billing completion notices) with the PONs in questions enumerated with the appropriate identification. The ticket is considered cleared when Verizon VT has either requested the CLEC to resubmit the PON or communicated the current status of the PON and provided the delayed status notifier to the CLEC. Tickets received after 5 P.M. and trouble ticket clearances sent after 5 P.M. will be

considered effective on the following business day. Performance shall be reported for the week in which the trouble ticket was received. This measure has a standard of 90% and \$47,222 in additional bill credits are available per month for CLECs if this is not satisfied. In addition, this measure is subject to the requirement that no more than 5% of the orders resubmitted by CLECs at Verizon VT's request are rejected as duplicates. Verizon VT must satisfy both standards to avoid the payment of bill credits. (See Appendix H.)

b. % SOP To Bill Completion Notice("BCN") Within 3 Business Days

This measure is defined as the percent of orders provisioning complete in Verizon VT's Service Order Processor ("SOP") that have BCN notices within 3 business days. The source of this information is the DCAS PON Master File. The start time is when physical completion of the order has been entered into SOP. The end time is when the BCN is time stamped in DCAS. \$23,611 in additional bill credits will be available for this measure. (See Appendix H.)

5. Billing Claims Measures

An additional \$8,333 per month, or \$100,000 annually, will be made available for bill credits for two billing performance measures, "% CLEC Billing Claims acknowledged within 2 business days" and "% CLEC Billing Claims resolved within 28 calendar days after acknowledgement".

Bill credits in the amount of \$8,333 will be distributed under this section to all CLECs with activity in these metrics based on the CLEC's lines in service if performance is less than

95% on either of the measures.¹³ These credits will be distributed in the same manner as the bill credits under Critical Measures, Aggregate Rule. (See Appendix H.)

F. The Change Control Assurance Plan

A total of \$470,000 will be placed at risk for the Change Control Process for those CLECs operating in Vermont. The credits will be made available using the same methodology used in New York. The Change Control process that is currently in place is common to systems in Vermont and New York. The proposed CCAP is attached in Appendix I and is consistent with the CCAP currently effective in New York.

G. Monthly Reports

To ensure that there is timely information regarding Verizon VT's performance, Verizon VT will report its performance on a monthly basis. Verizon VT will make a 9-page report ~~will be made~~ available to all CLECs providing service in Vermont with respect to each month after the Plan becomes effective.

A sample copy of the report appears in Appendix G. The first four pages will provide information regarding the MOE measures and will include:

1. Verizon VT actual performance to its retail customers where such measures exist and to CLECs for each metric;
2. The number of observations for Verizon VT and the CLECs for each measure (where applicable);

¹³

For the purpose of the Plan:

1. Lines in service for UNE means UNE-Platform lines, all types of loops and IOF.
2. Lines in service for Resale means Resale lines plus circuits.
3. Trunks – minutes of use per month.
4. Lines in service for DSL means DSL UNE loops and line shared loops.

3. The Verizon VT standard deviation (where applicable);
4. The sampling error (where applicable);
5. The appropriate statistical scores (where applicable)¹⁴ or the difference between Verizon VT's and the CLECs' actual performance on the measure (where applicable);
6. A performance score for each measure;
7. The weight for each measure;
8. The weighted performance score; and
9. An aggregation of the performance scores, weighted performance scores, and aggregate bill credits¹⁵, if any, due under each MOE.

The fifth page will list the Critical Measures and the bill credits, if any, that are due for these measures on an aggregate CLEC basis. The sixth page will include Special Provisions. The seventh page will include a summary of the CCAP measures and the bill credits due, if any. The eighth page will provide a summary of the total bill credits, if any, due the CLEC industry. The ninth page will provide the amount, if any, due to the individual CLEC for the MOE and Critical Measures.¹⁶ The monthly report will be provided within 28 days of the end of each month following the effective date of the PAP.

As part of its monthly report filings, Verizon VT will provide a PAP Measurements Summary (commonly referred to as the "family chart"), which summarizes by checklist item, where Verizon has made or missed the metrics and tracks the information over a 6 month period.

¹⁴ A Permutations Test will be applied to small sample sizes to obtain a probability. The probability will be converted to a Z or t score, which in turn will be converted to a performance score as described in the Guidelines and Appendix D.

¹⁵ Bill credit information will be provided and processed quarterly.

¹⁶ The computer model that will be used to calculate the MOE and Critical Measures bill credits will be posted on Verizon VT's TISOC Website after the Plan becomes effective.

Separately, Verizon VT will also provide a semi-annual report summarizing the prior six months' -1 scoring changes.

Verizon VT will provide a separate report on all measures that will be established in the Vermont C2C proceeding (Docket No. DT 01-006), allowing for future additions, deletions and other modifications ordered by the Commission. In addition, to the extent allowed by law, Verizon VT will make available CLEC-specific C2C electronic reports enabling those receiving the reports to evaluate performance at greater levels of detail. The C2C reports will be made available to any CLEC requesting the reports.

H. Bill Credits Payment

Under the Vermont PAP, a CLEC that is currently being provided with performance reports and credits under an interconnection agreement will receive the higher of the credits calculated under the two plans for a given month's performance.

Should Verizon VT's performance not meet the standards set forth above for the MOE and Critical Measure measurements, the Vermont Universal Service Fund will receive bill credits for those MOE categories that fall below the respective minimum levels and CLECs will receive bill credits for those ~~MOE categories or~~ Critical Measures scores that fall below the respective minimum levels. ~~Due to the offset provision for non-compliant measures with performance scores of -1 in the Vermont PAP, final performance results under the Vermont PAP cannot be determined until after the close of the second month after the month under review (e.g. January Vermont PAP results can be finalized based on March performance and reported in April).~~ To the extent that a CLEC is entitled to performance assurance payments or credits under an interconnection agreement between the CLEC and Verizon, the amount of any such interconnection agreement payment or credit will be credited against and reduce any amount due to the CLEC under the VT Plan.

If the bill credits exceed the balance due Verizon VT on the CLEC's bill (including any arrearage), the net balance will be ~~paid carried as a credit on~~ to the CLEC ~~by check's next month's bill~~.

Verizon VT will issue checks in lieu of outstanding bill credits to CLECs that discontinue taking service from Verizon VT ~~and have no outstanding bill balance. If a CLEC has a balance due to Verizon VT, a check will be issued only~~ in the amounts by which outstanding bill credits exceed any balance due from the CLEC (including any arrearage).

I. Term Of Performance Assurance Plan

The plan will become effective the first full calendar month following Verizon VT's entry into the interLATA market and the Commission will reevaluate the appropriateness of the Plan when Verizon VT eliminates its Section 272 affiliate. Until such time as a replacement mechanism is developed or the Plan is rescinded, the Plan will remain in effect, as it may be modified from time to time by the Commission.

J. Exceptions and Waiver Process

Recognizing that C2C service quality data may be influenced by factors beyond Verizon VT's control, Verizon VT may file Exception or Waiver petitions with the Commission seeking to have the monthly service quality results modified on three generic grounds. The first involves the potential for "clustering" of data, and the effect that such clustering has on the statistical models used in this Plan. The requirements of the clustering exception are set forth in Appendix D.

The second ground for filing an exception relates to CLEC behavior. If performance for any measure is impacted by unusual CLEC behavior, Verizon VT will bring such behavior to the attention of the CLEC and attempt to resolve the problem. Examples of CLEC behavior which may influence performance results include:

1. poor order quality, such as missing codes, incorrect codes or misspelled directory listings;
2. actions that cause excessive missed appointments, such as wrong addresses, wrong due dates or offered intervals shorter than the standard interval;
3. actions resulting in excessive multiple dispatch and repeat reports, such as incorrect dispatch information or inadequate testing by a CLEC;
4. inappropriate coding on orders, such as where extended due dates are desired and are not coded as such;
5. delays in rescheduling appointments when Verizon VT has missed an appointment.

If such action negatively influences Verizon VT's performance on any metric, Verizon VT will be permitted to petition for relief. The petition, which will be filed with the Commission and served on the CLEC, will provide appropriate, detailed documentation of the events, and will demonstrate that the CLEC behavior has caused Verizon VT to miss the service quality target. Verizon VT's petition must include all data that demonstrates how the measure was missed. It should also include information that excludes the data affected by the CLEC behavior. CLECs and other interested parties will be given an opportunity to respond to any Verizon VT petition for an Exception. If the Commission determines that the service results were influenced by inappropriate CLEC behavior, the data will be excluded from the monthly reports.

The third ground for filing a waiver relates to situations beyond Verizon VT's control that negatively affect its ability to satisfy only those measures with absolute standards. The performance requirements dictated by absolute standards establish the quality of service under normal operating conditions, and do not necessarily establish the level of performance to be achieved during periods of emergency, catastrophe, natural disaster, severe storms, work stoppage, or other events beyond Verizon VT's control.

Verizon VT may petition the Commission for a waiver of specific performance results for those metrics that have performance targets dictated by absolute standards, if Verizon VT's performance results do not meet the specific standard. This waiver process shall not be available for those metrics for which Verizon VT's wholesale performance is measured by comparison to retail performance (parity metrics).

Any petition pursuant to this provision must demonstrate clearly and convincingly the extraordinary nature of the circumstances involved, the impact that the circumstances had on Verizon VT's service quality, why Verizon VT's normal, reasonable preparations for difficult situations proved inadequate, and the specific days affected by the event. The petition must also include an analysis of the extent to which the parity metrics (retail and wholesale) were affected by the subject event, and must be filed within 45 days from the end of month in which the event occurred.

The Commission will determine which, if any, of the daily and monthly results should be adjusted in light of the extraordinary event cited, and will have full discretion to consider all available evidence submitted. Insufficient filings may be dismissed for failure to make a *prima facie* showing that relief is justified.

Verizon VT need not make PAP payments or credits after filing an exception of waiver petition based on the situations beyond Verizon VT's control until resolution of the waiver request. Verizon VT may not suspend payments or credits, however, during the pendency of any exception or waiver petition based on "clustering" or CLEC behavior

K. Annual Review, Updates And Audits

1. Annual Review, Updates and Audits

Each year the Commission and Verizon VT may review and/or audit the Performance Assurance Plan to determine whether any modifications or additions should be made. During this review, the Commission and Verizon VT can determine, among other things, whether: (1) measures and weights should be modified, added or deleted; (2) modifications should be made to the distribution of dollars at risk among the four MOE and Critical Measures categories; (3) geographic deaveraging should be adopted for reporting metric results; (4) the clustering and CLEC behavior exceptions included in Appendix D should be modified; (5) small sample size procedures should be modified; and (6) the methodologies used to calculate the bill credits should be modified.¹⁷ All aspects of the Plan, however, will be subject to review. The annual review process may be initiated no more than six months before the anniversary date of Verizon VT's entry into the long distance market pursuant to Section 271. Any modifications to the Plan will be implemented as soon as is reasonably practical after Commission approval of the modifications.

¹⁷

In particular, during the first annual review, the methodology used to calculate amounts due to CLECs under the Individual Rule for bill credits under the Critical Measures category will be analyzed to determine whether the rule provides for an appropriate distribution of bill credits.

2. Changes to the New York Plan

Verizon VT will file changes to the New York Plan adopted by the New York PSC with the Vermont Commission within 30 days from the date of the New York PSC order adopting those changes, for review and inclusion in the Vermont Plan upon the Commission's approval.